

# **APPENDIX G**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

EX PARTE APPLICATION OF IRAQ  
TELECOM LIMITED FOR AN EXPEDITED  
ORDER TO TAKE DISCOVERY  
PURSUANT TO 28 U.S.C. § 1782,  
Applicant,

SIRWAN SABER MUSTAFA, and KOREK  
TELECOM COMPANY LLC.  
Intervenors.

Case No. 1:18-mc-00458 (LGS) (OTW)

**SUPPLEMENTAL DECLARATION OF KRISTIN N. TAHLER**

Pursuant to 28 U.S.C. § 1746, I, Kristin N. Tahler, declare under penalty of perjury as follows:

1. I am the same Kristin N. Tahler who submitted a declaration on October 4, 2018 (the “First Tahler Declaration”) in support of Iraq Telecom Limited’s *Ex Parte* Application for Expedited Judicial Assistance Pursuant to 28 U.S.C. § 1782 (the “Application”). I continue to represent Iraq Telecom Limited (“Iraq Telecom” or the “Applicant”) in this matter.<sup>1</sup>

2. I submit this supplemental declaration in support of Iraq Telecom’s Reply in support of the Application (“Reply”) and in response to certain representations made by the Opposition to the Application (“Opposition”) filed by the Intervenor, Mr. Sirwan Saber Mustafa Barzani (referred to as “Mr. Barzani” in the Application but referenced herein as “Mr. Mustafa”).

3. I am familiar with the information set forth in this supplemental declaration either from personal knowledge or on the basis of documents I have reviewed. The facts and matters testified to are true to the best of my own knowledge and belief. Because I submit this

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<sup>1</sup> Unless otherwise noted, all capitalized terms contained herein have the same meaning as set forth in the Application and the First Tahler Declaration.

supplemental declaration specifically in support of the Reply and in response to the Opposition, it does not contain each and every fact within my knowledge regarding the topics discussed herein.

**I. COOPERATION WITH CORRESPONDENT BANKS REGARDING SCOPE OF DISCOVERY**

4. Counsel for certain of the Correspondent Banks have reached out to Iraq Telecom to discuss the scope of the proposed subpoenas in the event the Court grants the Application. On behalf of Iraq Telecom, I have been in contact with said counsel, and our discussions are ongoing.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Los Angeles, California on this the 30th of November, 2018.



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Kristin N. Tahler